

April 10, 2006

Ms. Jackalyne Pfannenstiel
Vice Chair
Presiding Member, Efficiency Committee
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Mr. Arthur H. Rosenfeld
Commissioner
Associate Member, Efficiency Committee
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

**RE: Request for Delay of Effective Date for External Power Supply Standard—Appliance
Battery Chargers DOCKET 06-AAER-1**

Dear Ms. Pfannenstiel & Mr. Rosenfeld:

The members of the Association of Home Appliance Manufacturers (AHAM) have recently become aware of a new proposal from the Consumer Electronics Association (CEA) with regard to the rulemaking on External Power Supplies and Battery Chargers.

With regard to this proposal, we wish to express our support for the idea of dividing the External Power Supply regulation into three parts for further consideration: computer and IT products, cordless phones and “all other products.” It is our understanding that appliance battery chargers fall within the “all other products” branch of this division. We agree that an extension of time until July 1, 2007 will give us the opportunity to meet this very demanding requirement and will lessen the effects on our member companies. For the rulemaking currently underway, we ask that the Commission grant this request.

After this rulemaking is completed, we would ask that, together with representatives from the Consumer Electronics Association, we use this intervening year to further explore two important items. One, we believe that it is possible to reach agreement on a test procedure and regulation for energy efficiency of appliance battery chargers. We would ask that the CEC staff work with us on this item. In addition, the subject of “infrequently charged” products was raised at the hearing by Mr. Tutt and Commissioner Rosenfeld. There are several products within the scope of both AHAM and CEA that fall into this category. We believe that this issue deserves further discussion. The additional time will produce a more accurate procedure and regulation.

Sincerely,



Wayne Morris
Vice President, Division Services